#### **BEFORE**

# THE PUBLIC SERVICE COMMISSION OF

#### **SOUTH CAROLINA**

#### **DOCKET NO. 2013-55-C**

#### IN RE:

South Carolina Telephone Coalition	)	
Petition to Modify Alternative	)	
Regulation Plans Filed Pursuant to S.C.	)	PETITION TO INTERVENE
Code Section 58-9-576(B) to Take Into	)	
Account Recent Action by the Federal	)	
Communications Commission	)	

Petitioner Sprint Communications Company L.P. ("Sprint" or "Petitioner"), by its undersigned attorneys, hereby petitions the South Carolina Public Service Commission (the "Commission"), pursuant to Rule 103-825 of the Commission's Rules, for an order allowing Sprint to intervene in the above referenced Docket, with full rights to participate as a party of record. In support of its petition, Sprint would show the Commission the following:

1. On February 8, 2013, the South Carolina Telephone Coalition ("SCTC") filed a Petition with the Commission to establish new price caps for basic local residential service provided under alternative regulation plans filed by SCTC member companies. The SCTC stated in its petition that the existing plans cap basic local residential and single-line business service at the statewide average rates for such service, and requested that the Commission establish new price caps for basic local residential service at the applicable nationwide average rates for this

service. The SCTC feels that this action is necessary to allow SCTC member companies the flexibility to meet rate floors established by the Federal Communications Commission ("FCC").

- 2. The South Carolina Cable TV Association ("SCCTA") recently filed a Motion in this Docket raising issues with respect to the relief sought by the SCTC member companies in this Docket and its effect on the South Carolina Universal Service Fund ("State USF"). The SCTC has filed a response to the SCCTA's Motion.
- 3. Sprint is a carrier authorized by the Commission to provide telecommunications services in South Carolina. Sprint pays into the State USF. As such, Sprint has an interest in this proceeding, will be affected by the outcome of this proceeding, and seeks to participate in this Docket in order to protect and pursue its interests.
- 4. Petitioner should therefore be permitted to intervene in this proceeding in order to participate fully and present testimony and other evidence as appropriate.
  - 5. Sprint has not yet developed a position on the issues in this proceeding.
  - 6. Petitioner's authorized representative in this proceeding is:

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7. Sprint asserts that the granting of its Petition to Intervene will not in any way delay the proceedings in this Docket.

# WHEREFORE, Sprint prays for the Commission to:

- a. Grant this Petition to Intervene and make Petitioner a party of record in Docket No. 2013-55-C, allowing Petitioner to participate fully and take such positions as it deems advisable; and
- b. Grant such other relief as the Commission deems just and proper.

Respectfully submitted,

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July 3, 2013 Columbia, South Carolina

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#### THE PUBLIC SERVICE COMMISSION OF

#### **SOUTH CAROLINA**

#### **DOCKET NO. 2013-55-C**

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South Carolina Telephone Coalition	)
Petition to Modify Alternative	)
Regulation Plans Filed Pursuant to S.C.	) CERTIFICATE OF SERVICE
Code Section 58-9-576(B) to Take Into	)
Account Recent Action by the Federal	)
Communications Commission	)

This is to certify that I have caused to be served this day, the Petition to Intervene filed by Sprint Communications Company L.P., as follows:

# VIA FIRST CLASS AND ELECTRONIC MAIL SERVICE

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